

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

AUG 31 1999

In re the Matter of:

Amendment of Section 73.202(b), Table
of Allotments, FM Broadcast Stations
(Graham, Texas)

MM Docket No. 99-577
RM-9662
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

**REPLY TO
COUNTERPROPOSAL**

Graham Tollway Broadcasting Company ("GTBC"), by its attorneys and pursuant to §§1.415 and 420 of the Commission's Rules and Regulations, hereby submits its Reply Comments in the above-referenced proceeding. Pursuant to Notice of Proposed Rule Making, DA 99-1234, released June 25, 1999 ("Notice"), reply comments in this proceeding are due on August 31, 1999. As such, this is timely filed.

In its original Petition for Rulemaking filed May 26, 1999, GTBC initiated the instant rule making proceeding and proposed the amendment of the FM Table of Allocations to permit the allocation of Channel 253A to Graham, Texas. In support of that proposal were engineering schedules, detailing the co- and adjacent channel spacing requirements needed to achieve this amendment of §73.202(b) of the Commission's Rules. The Commission has concurred with the finding and issued the Notice.

In its August 11, 1999 Comments, GTBC reaffirmed its support for its original proposal and its present intention to apply for Channel 253A and, if authorized, to build

No. of Copies rec'd 04
List ABCDE

the station promptly and commence service to the residents of Graham and the surrounding area in the public interest.

On August 16, 1999, North Texas Radio Group, L.P. ("NTRG") filed a Counterproposal, proposing to upgrade its FM station KBOC (FM) at Bridgeport, TX from Class A to a full Class C and to make several other related changes.

GTBC opposes the Counterproposal for the reasons set forth herein and in the engineering statement which is attached hereto as Exhibit 1. As is pointed out, the Counterproposal is procedurally defective because it omitted certain FCC required information.

In addition, GBTC submits that Bridgeport, Texas site does not meet the FCC spacing requirements pursuant to §73.208 of the Commission's Rules and Regulations. For Stephenville and Bonham, Texas, NTRG proposes to remove the only FM service in each city which will leave both cities with daytime-only AM stations. In Stephenville, under NTRG's proposal, 27,591 people will be deprived of nighttime service and in Bonham, 39,391 people would be deprived of such service.

Additionally, the proposed modifications to stations in Lawton, Oklahoma and Palestine, Texas should have been done prior to and outside of this Rulemaking. In any event, these modifications require gain/loss studies to demonstrate the population counts of those served by five or more stations.

In Tecumseh, Oklahoma and Price, Texas, NTRG seeks to add new FM services, without any additional showings; in particular, there is no information on the 1990 US Census to indicate that Price, Texas is a town, city or CDP.

Further, as is discussed in Exhibit E, there are more than five existing services which provide service over the entire area proposed for Bridgeport. Some parts of the new service area have over 100 stations providing service. Although the Counterproposal states that 10, 000 persons would be provided with a first local service,

240,475 people would lose the combined coverage of present service and the proposed service of GTBC.


Finally, NTRG states that it *and other unnamed licensees* who have negotiated with NTRG for facility change agreements will make applications for the new services. Based on the Commission's real party in interest concerns, it is submitted that the other licensees must be identified and must make their own statements regarding their commitment to filing applications and constructing facilities. In its present state, it appears that the Counterproposal is defective and should be dismissed.

Based on the foregoing, Graham Tollway Broadcasting Company requests that the Commission dismiss or deny the referenced counterproposal of North Texas Radio Group, L.P.

Respectfully submitted,

**GRAHAM TOLLWAY BROADCASTING
COMPANY**

By:


Audrey P. Rasmussen
Its Attorney

O'Connor & Hannan, L.L.P.
1666 K Street, N.W.
Suite 500
Washington, D.C. 20554
(202) 887-1431

Dated: August 31, 1999

TECHNICAL NARRATIVE

Graham Tollway Broadcasting Company ("GTBC") seeks to add a new FM Channel 253A to Graham, Texas as has been established in Docket 99-233. Exhibits A (Allocation Study), B (city of license coverage), and C (Site Area Map) are included in this narrative to confirm that the request is valid and meets all aspects of the Rules and Commission's Policies and will serve 15,289 persons. Separately GTBC has issued its continued expression of interest. This request has now become mutually exclusive with a request from North Texas Radio Group, LP ("NTRG"). GTBC seeks to demonstrate that the request of NTRG is defective and the Commission should dismiss the NTRG request and grant GTBC's request.

NTRG's main objective in its rulemaking is to change the class of KBOC from 252A to 252C in an effort to add another channel in the Dallas-Fort Worth radio market. Throughout the technical showings, NTRG has failed to meet the FCC's Report and Order in MM Docket 92-159, 8 FCC 2d 4735 (released July 13, 1993). This states that the applicant must:

1. Provide an allotment site map that complies with the requirements of the April 5, 1985 Public Notice, Memo 3693, to show that the proposed site is on a real land area and;
2. A statement that the reference site is suitable for a tower and may be constructed without regard to FAA or local zoning issues. NTRG has not provided either of these for any of the proposed allocation sites in their proceeding.
3. A city coverage map, showing the allotment site is in compliance with 47 C.F.R. § 73.315. NTRG has not provided these for any of the proposed allocation sites in their proceeding.
4. A showing demonstrating that the allotment site is in compliance with 47 C.F.R. § 73.207. This is the only thing provided by NTRG.

BRIDGEPORT, TEXAS

Exhibit D is a re-study of the reference coordinates of KBOC 252C. This shows the reference site short spaced to KRYL, Gatesville, Texas, CP (BPH-990527ID). This is addressed in the technical portion of the counter-petition under "VII. Other Considerations". This actually addresses the short spacing and requests that it be considered under §73.215. GTBC objects to this move as the MM Docket 92-159 clearly states that a reference site must meet the spacings of §73.207, which this request clearly does not.

STEPHENVILLE, TEXAS

NTRG seeks to remove the only FM service for Stephenville, KCUB, and leave it with a daytime-only AM station. This station, KSTV, operates on 1510 kHz and is prevented from having nighttime service because WLAC, Nashville, TN operates co-channel, is a Class A station and its protected 0.5 mV/m 50% nighttime contour cannot be protected while providing night service to Stephenville. This means that 27,591 persons are deprived from nighttime service. GTBC objects to this removal of service as NTRG has failed to provide a gain/loss study to demonstrate that these persons have at least 5 or more full-time broadcast service over the area lost. NTRG only asserts that other station cover the area.

NTRG seeks to move this service to Ranger, Texas, with no basis for the need in Ranger.

BONHAM, TEXAS

NTRG seeks to remove the only FM service for Bonham, KFYZ, and leave it with a daytime-only AM station with a post-sunset operating authority. This station, KFYN, operates on 1420 kHz with 250 Watts and has nighttime power of 148 Watts, which is not a protected service. The nighttime limit of KFYN is the 12 mV/m (NIF) contour. This means that 39,391 persons outside the NIF contour are deprived from nighttime service. GTBC objects to this removal of service as NTRG has failed to provide a gain/loss study to demonstrate that these persons have at least 5 or more full-time broadcast service over the area lost. NTRG only asserts that other station cover the area. If the construction permit (BMPH-971002IC) were licensed, the lost population would be 109,179 persons.

NTRG asserts to move this 253C3 service to 262A in Fort Towson, OK. There is no mutual exclusivity in these frequencies. The Commission could add 262A to Fort Towson, OK on its own motion and therefore has no merit as an allocation factor in this proceeding.

LAWTON, OKLAHOMA

NTRG seeks to down-grade KJMZ from a Class C1 station to a Class A station with site restrictions. This should not have been a part of the Rulemaking and should have been done before and outside this action. As a part of the Rulemaking, there would necessarily be a gain/loss study required to prove to the Commission that the 39,145 persons would be served by 5 or more stations.

PALESTINE, TEXAS

NTRG seeks to down-grade KYYK from a Class C2 station to a Class C3 station with site restrictions. This should not have been a part of the Rulemaking and should have been done before and outside this action. As a part of the Rulemaking, there would

necessarily be a gain/loss study required to prove to the Commission that the 119,059 persons would be served by 5 or more stations.

TECUMSEH, OKLAHOMA

NTRG seeks to add a new FM service on 251A in Tecumseh as a result of down-grading KJMZ, Lawton, OK. There is no merit, need or basis for this allocation to be considered, only that it exists.

PRICE, TEXAS

NTRG seeks to add a new FM service on 251A in Price as a result of down-grading KYK, Palestine, TX. There is no merit, need or basis for this allocation to be considered, only that it exists. Price, Texas does not exist in the 1990 US Census as a town, city or CDP.

SERVICES TO PROPOSED BRIDGEPORT

A study was made and shown in Exhibit E over the proposed new service area for KBOC, Class C. This shows that more than 5 existing services provide service over the entire area. Over at least some part of the new service area there are over 100 stations providing service. The NTRG proposal states that 10,000 persons would be provided with a first local service with the grant of their application. This is at the expense of losing 240,475 persons who currently receive services and the proposed service of GTBC. We do not know if these areas are served with 5 or more other services as FCC seeks.

EXPRESSIONS OF INTEREST

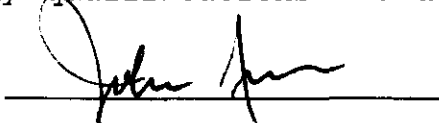
NTRG's conclusion stated that it and "other licensees with whom NTRG has negotiated facility change agreements" will make applications for the new services. This is NOT a firm commitment and expression from those who have an interest. GTBC believes these persons should be named who will make applications for all these new services proposed, or they must be dismissed.

ALTERNATE PROPOSAL

GTBC believes that if increase of power is necessary for the continued operation of KBOC, then it proposes a reference coordinate as a Class C2 which will accommodate both NTRG and GTBC's requests. This allocation is shown in Exhibit F.

The above statements are true and correct to the best of my knowledge and belief. My qualifications are a matter of record with the FCC.

August 30, 1999



John R. Furr

08-30-1999

John Furr & Associates Inc.

PAGE 1

FM Study for: FR ADD
 Location: GRAHAM, TX
 Call City, State
 Status Proponent

FCC Database Date: 9/1999 33-02-30
 Channel Class: A 98-39-00
 Chan Class Freq kW Latitude Dist. Required
 File Number HAAT Longitude Azm. Clear (km)

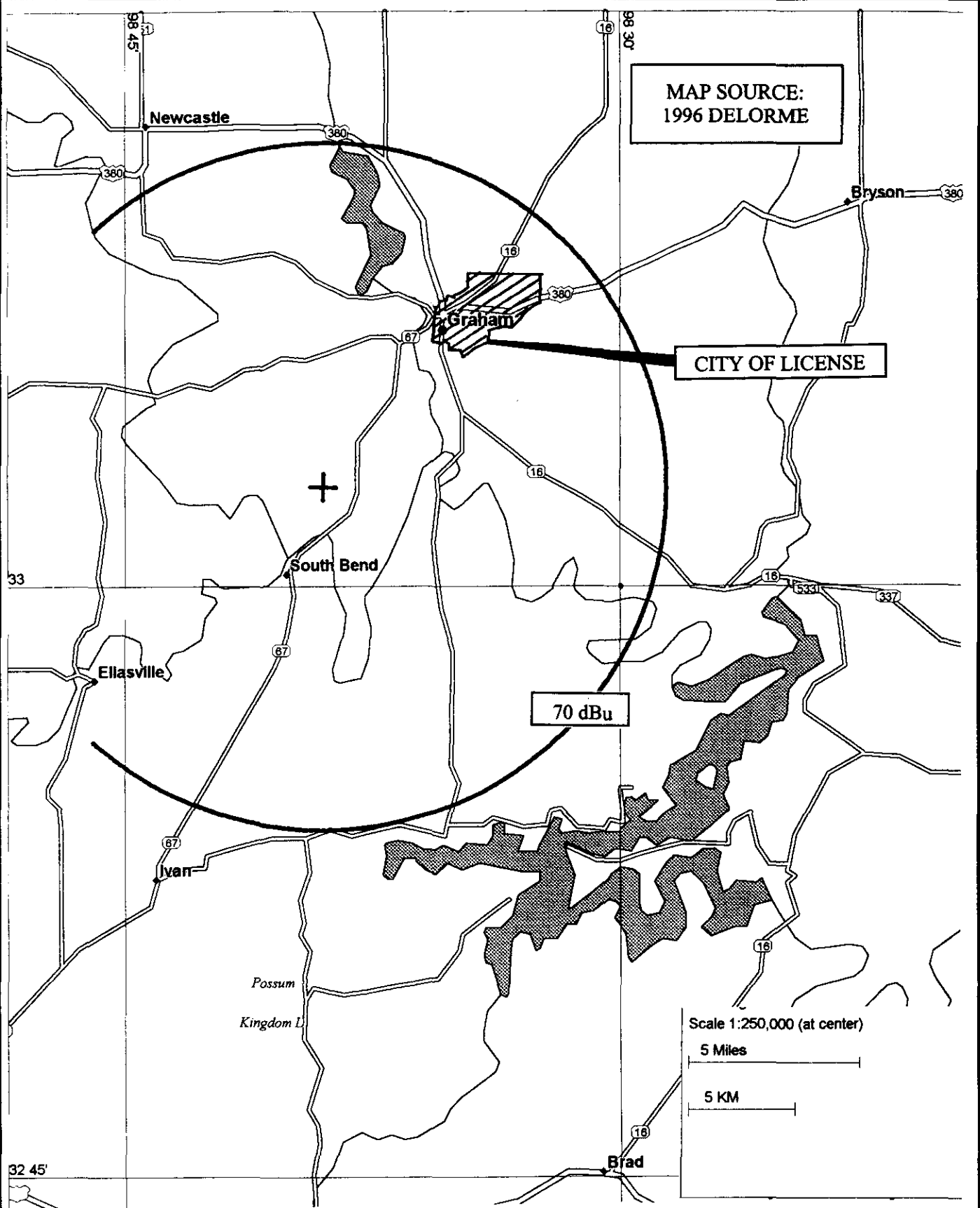
>>>>>> Study For Channel 253 98.5 MHz <<<<<<<

FR ADD GRAHAM, TX	253 A	98.5		33-02-30	0.0	115	
ADD Graham Tollway Broadc Docket-99-233	0	98-39-00	0.0	-115.0	SHORT		
Drop-in; 9.2 km SW of Granham							
KTIJ ELK CITY, OK	253 C	98.5	100.	34-58-39	225.90	226	
CP W.H.A.M. for Better B	BMPH-870911IA	332	99-24-35	342.1	-0.10	CLOSE	
KLUVFM DALLAS, TX	254 C	98.7	99.	32-35-19	165.33	165	
LIC Infinity Broadcasting	BLH-990216KA	507	96-58-05	107.2	+0.33	CLOSE	
KBOC BRIDGEPORT, TX	252 A	98.3	6.0	33-13-28	82.1	72	
LIC Community Broadcast N	BMLH-971020KB	69	97-47-51	75.5	+10.1	CLOSE	
From Channel 244A per D96-10							
KHCK DENTON, TX	256 C	99.1	97.	33-23-22	108.3	95	
LIC KDZR-FM License Corp.	BLH-880926KC	356	97-33-53	68.8	+13.3	CLOSE	
KCUBFM STEPHENVILLE, TX	252 A	98.3	3.0	32-17-07	97.8	72	
APP M & M Broadcasters, L	BPH-990208IA	100	98-06-53	148.9	+25.8	CLEAR	
KCUBFM STEPHENVILLE, TX	252 A	98.3	3.0	32-12-18	99.9	72	
LIC M & M Broadcasters, L	BLH-900706KC	100	98-15-23	158.2	+27.9	CLEAR	
FR ALBANY, TX	255 A	98.9		32-43-36	69.7	31	
ADD Albany Broadcasting C	RM-	0	99-17-42	240.1	+38.7	CLEAR	

JF&A
 COMMUNICATIONS
 CONSULTANTS

ALLOCATION STUDY

GTBC
 GRAHAM, TX
 EXHIBIT A



MAP SOURCE:
1996 DELORME

CITY OF LICENSE

70 dBu

Scale 1:250,000 (at center)

5 Miles

5 KM

JF&A
COMMUNICATIONS
CONSULTANTS

CITY OF LICENSE

GTBC
GRAHAM, TX
EXHIBIT B

08-30-1999

John Furr & Associates Inc.

PAGE 1

FM Study for: KBOC
 Location: BRIDGEPORT, TX
 Call City, State
 Status Proponent

FCC Database Date: 9/1999
 Channel Class: C
 Chan Class Freq kW Latitude Dist.
 File Number HAAT Longitude Azm. Required
 Clear (km)

>>>>>> Study For Channel 252 98.3 MHz <<<<<<<

KBOC BRIDGEPORT, TX 252 A 98.3 6.0 33-13-28 36.3 226
 LIC Community Broadcast N BMLH-971020KB 69 97-47-51 231.5 -189.7 SHORT
 Use of 73.215 for short spacing requires: 203 -166.7 SHORT
 From Channel 244A per D96-10

KFYZFM BONHAM, TX 252 C3 98.3 5.5 33-37-30 109.8 237 73.215
 CP Bonham Broadcasting C BPH-971002IC 209 96-20-03 78.3 -127.2 SHORT
 Use of 73.215 for short spacing requires: 226 -116.2 SHORT
 From channel 252A Per D89-209

KFYZFM BONHAM, TX 252 C3 98.3 25. 33-33-16 118.8 237
 LIC Bonham Broadcasting C BLH-960502KD 83 96-13-24 82.9 -118.2 SHORT
 Use of 73.215 for short spacing requires: 226 -107.2 SHORT
 From channel 252A Per D89-209

KCUBFM STEPHENVILLE, TX 252 A 98.3 3.0 32-17-07 139.5 226
 APP M & M Broadcasters, L BPH-990208IA 100 98-06-53 204.8 -86.5 SHORT
 Use of 73.215 for short spacing requires: 203 -63.5 SHORT

KACO ARDMORE, OK 253 C3 98.5 14.0 34-10-56 91.7 176 73.215
 LIC KRIG, Inc. BLH-971010KI 104 97-05-01 24.3 -84.3 SHORT
 Use of 73.215 for short spacing requires: 165 -73.3 SHORT
 From Channel 243A per D96-10; from Channel 253A per one-step application.
 Petition for Recon D96-10 filed 2-18-97-Dismissed MO&O D96-10, 970815

KCUBFM STEPHENVILLE, TX 252 A 98.3 3.0 32-12-18 153.4 226
 LIC M & M Broadcasters, L BLH-900706KC 100 98-15-23 208.0 -72.6 SHORT
 Use of 73.215 for short spacing requires: 203 -49.6 SHORT

KJNZ LAWTON, OK 251 C1 98.1 100. 34-35-27 151.4 209
 LIC Sovereign Broadcastin BLH-4928 61 98-21-10 328.6 -57.6 SHORT
 Use of 73.215 for short spacing requires: 188 -36.6 SHORT
 Horizontally polarized only

FR ADD GRAHAM, TX 253 A 98.5 33-02-30 116.1 165
 ADD Graham Tollway Broadc Docket-99-233 0 98-39-00 248.6 -48.9 SHORT
 Use of 73.215 for short spacing requires: 142 -25.9 SHORT
 Drop-in; 9.2 km SW of Granham

KYYK PALESTINE, TX 252 C2 98.3 50. 32-00-13 229.5 249
 LIC Willow Creek Entertai BLH-900907KE 150 95-43-07 133.1 -19.5 SHORT
 Use of 73.215 for short spacing requires: 237 -7.5 SHORT

KRYL GATESVILLE, TX 252 A 98.3 1.+ 31-26-31 221.3 226 73.215
 CP Capstar Royalty II Co BPH-990527ID 80 97-42-29 185.3 -4.7 SHORT
 Use of 73.215 for short spacing requires: 203 +18.3 CLEAR

ALLOC HEALDTON, OK 249 C3 97.7 34-17-28 95.63 96
 VAC Docket-98-75 0 97-29-23 0.2 -0.37 CLOSE
 Site Restriction 6.6km North
 Effective 4-26-1999, reserved for KGOK-FM, per D 98-75

JF&A
 COMMUNICATIONS
 CONSULTANTS

ALLOCATION STUDY

GTBC
 GRAHAM, TX
 EXHIBIT D

08-30-1999

John Furr & Associates Inc.

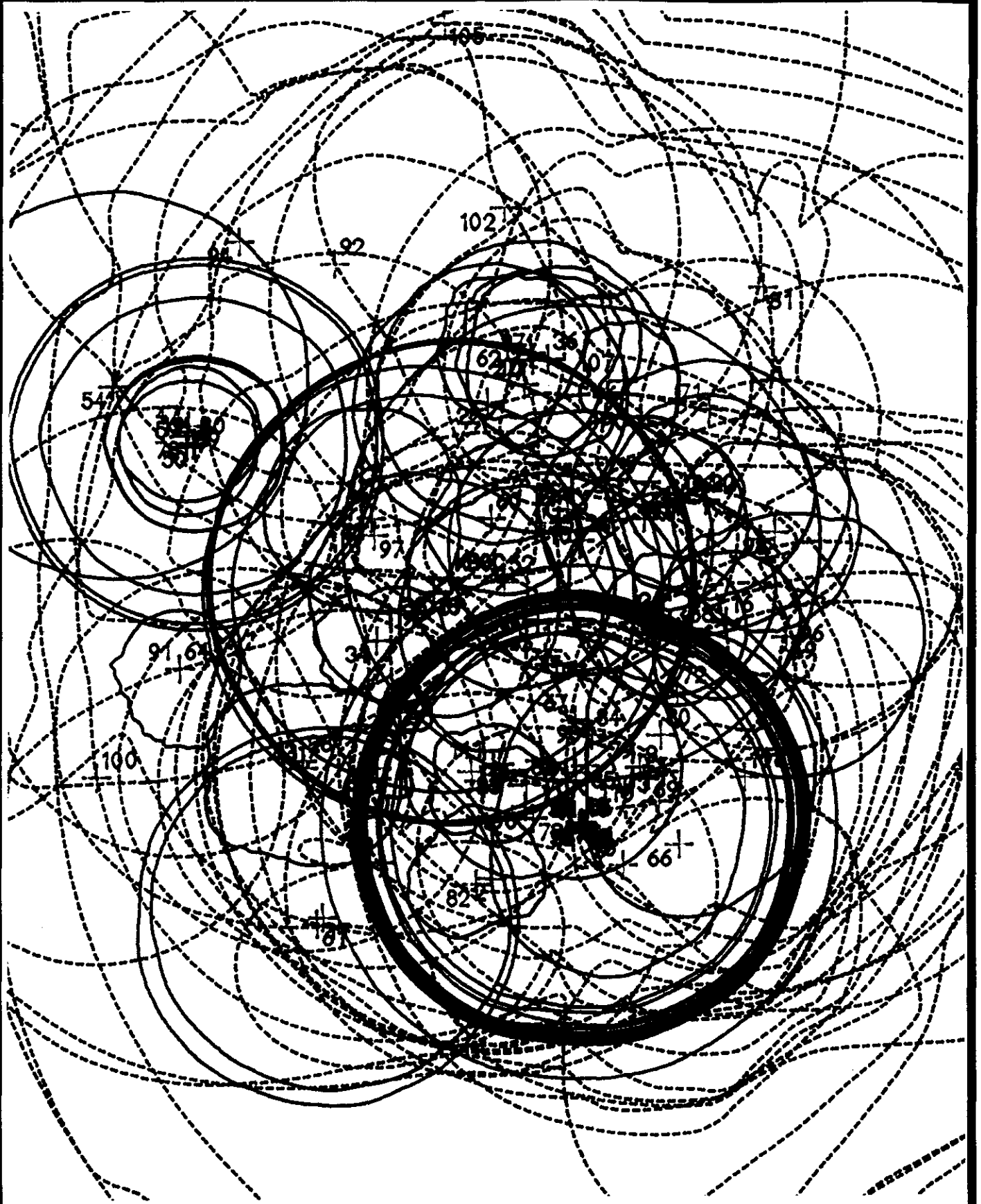
PAGE 2

FM Study for: KBOC		FCC Database Date: 9/1999		33-25-44	
Location: BRIDGEPORT, TX		Channel Class: C		97-29-34	
Call	City, State	Chan Class	Freq kW	Latitude	Dist.
Status	Proponent	File Number	HAAT	Longitude	Azm.
					Required Clear (km)
KRYL	GATESVILLE, TX	252 A	98.3 3.00	31-23-52	225.66
LIC	LDR Broadcasting, Ltd	BLH-7038	91	97-38-24	183.6
					226
					-0.34
					CLOSE
KLUVFM	DALLAS, TX	254 C	98.7 99.	32-35-19	105.30
LIC	Infinity Broadcasting	BLH-990216KA	507	96-58-05	152.1
					105
					+0.30
					CLOSE
KBFB	DALLAS, TX	250 C	97.9 99.	32-35-15	105.48
LIC	WHFS, Inc.	BLH-910515KB	491	96-57-59	152.1
					105
					+0.48
					CLOSE
KTIJ	ELK CITY, OK	253 C	98.5 100.	34-58-39	246.4
CP	W.H.A.M. for Better B	BMPH-870911IA	332	99-24-35	314.7
					241
					+5.4
					CLOSE
KGOKFM	HEALDTON, OK	249 C3	97.7 25.	34-21-00	102.2
APP	AM & PM Communication	BPH-990603IF	100	97-27-35	1.7
					96
					+6.2
					CLOSE
*Changed from Paul's Valley to Healdton, OK per D98-75.					
ALLOC	ANSON, TX	251 C1	98.1	32-26-39	236.4
VAC		-	0	99-44-03	243.1
					209
					+27.4
					CLEAR
Reserved for KKHR per One-Step Application BPH-990122IG					
KKHR	ANSON, TX	251 C1	98.1 80.	32-39-49	236.4
APP	George L. Chambers	BPH-990122IG	89	99-51-18	249.6
					209
					+27.4
					CLEAR
From Channel 251C2-One Step Application					

JF&A
COMMUNICATIONS
CONSULTANTS

ALLOCATION STUDY

GTBC
GRAHAM, TX
EXHIBIT D



JF&A
COMMUNICATIONS
CONSULTANTS

SERVICE TO PROPOSED AREAS

GTBC
GRAHAM, TX
EXHIBIT E

08-30-1999

John Furr & Associates Inc.

FCC Database Date: 9/1/1999

PAGE 1

# CALL STATUS	LOCATION STATE	CHANNEL POWER CLASS	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC
KBOC LIC	BRIDGEPORT TX BMLH-971020KB	252 100.0 kW Class C	33-25-44 97-29-34	Source Station	
1 KNTU LIC	DENTON TX BMLD-920107KG	201 100.0 kW Class C1	33-17-24 97-08-11	37 km 115 dg	92 km 0 km WITHIN
2 KJCR LIC	KEENE TX BLED-900510KA	202 23.0 kW Class C3	32-24-19 97-19-55	115 km 172 dg	93 km 30 km +7 km
3 KEOM LIC	MESQUITE TX BLED-920113KB	203 61.0 kW Class C1	32-45-45 96-38-04	109 km 132 dg	92 km 40 km +23 km
4 KTCUFM LIC	FORT WORTH TX BLED-810410BF	204 3.0 kW Class A	32-42-40 97-22-00	80 km 172 dg	93 km 40 km WITHIN
5 KMQX LIC	SPRINGTOWN TX BLED-850910KB	206 0.4 kW Class A	32-58-53 97-42-18	53 km 202 dg	92 km 52 km WITHIN
6 KNON LIC	DALLAS TX BLED-900309KA	207 55.0 kW Class C1	32-35-24 96-58-21	105 km 152 dg	93 km 47 km +34 km
7 KYQX LIC	WEATHERFORD TX BLED-860107KE	208 0.4 kW Class A	32-45-06 97-48-06	80 km 201 dg	92 km 47 km WITHIN
8 KMOC LIC	WICHITA FALLS TX BLED-870720KA	208 3.0 kW Class C3	33-54-04 98-32-21	110 km 299 dg	91 km 34 km +16 km
9 KERA LIC	DALLAS TX BLED-1280	211 95.0 kW Class C	32-34-43 96-57-12	107 km 152 dg	93 km 81 km +66 km
10 KLCU LIC	ARDMORE OK BLED-980519KA	212 25.0 kW Class C3	34-12-10 97-09-12	91 km 20 dg	91 km 33 km +33 km
11 KTEO LIC	WICHITA FALLS TX BLED-930823KH	213 7.0 kW Class C3	33-53-50 98-32-33	110 km 298 dg	91 km 34 km +16 km
12 KCBIFM LIC	DALLAS TX BLED-880511KB	215 98.0 kW Class C	32-35-22 96-58-10	105 km 152 dg	93 km 86 km +73 km
13 KDKR LIC	DECATUR TX BLED-980624KA	217 21.0 kW Class C2	33-23-12 97-33-57	8 km 235 dg	92 km 86 km WITHIN
14 KVTT LIC	DALLAS TX BLED-861212KB	219 100.0 kW Class C	32-35-24 96-58-21	105 km 152 dg	93 km 78 km +65 km
15 KPFC LIC	CALLISBURG TX BLED-980427KA	220 0.3 kW Class A	33-40-11 97-00-50	52 km 59 dg	92 km 8 km WITHIN

JF&A
COMMUNICATIONS
CONSULTANTS

SERVICE TO PROPOSED AREAS

GTBC
GRAHAM, TX
EXHIBIT E

FCC Database Date: 9/11/1999

PAGE 2

#	CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC 60 dBu
16	KXEZ LIC	FARMERSVILLE TX BLH-980918KD	221 Class A	2.7 kW	33-16-31 96-22-02	106 km 99 dg	92 km 29 km +15 km
17	KTFW LIC	GLEN ROSE TX BLH-990429KC	221 Class C1	25.0 kW	32-16-31 98-01-22	137 km 201 dg	92 km 69 km +24 km
18	KZPS LIC	DALLAS TX BLH-801126AA	223 Class C	96.0 kW	32-35-22 96-58-10	105 km 152 dg	93 km 87 km +74 km
19	KNINFM LIC	WICHITA FALLS TX BMLH-880330KB	225 Class C1	100.0 kW	33-54-04 98-32-21	110 km 299 dg	91 km 72 km +54 km
20	KMKT LIC	BELLS TX BLH-970815KB	226 Class C3	6.8 kW	33-41-31 96-26-36	102 km 73 dg	92 km 37 km +27 km
21	KKZN LIC	HALTOM CITY TX BLH-961016KC	227 Class C2	50.0 kW	32-48-29 97-07-52	77 km 154 dg	93 km 37 km WITHIN
22	KICM LIC	HEALDTON OK BMLH-960118KE	229 Class C2	33.0 kW	34-02-27 97-20-00	69 km 12 dg	91 km 30 km WITHIN
23	KLTY LIC	FORT WORTH TX BLH-821104AG	231 Class C	98.0 kW	32-35-22 96-58-10	105 km 152 dg	93 km 87 km +74 km
24	KDGE LIC	GAINESVILLE TX BLH-900606KA	233 Class C	100.0 kW	33-33-36 96-57-35	52 km 73 dg	92 km 87 km WITHIN
25	KWRDFM LIC	ARLINGTON TX BLH-910506KF	235 Class C	98.0 kW	32-35-22 96-58-10	105 km 152 dg	93 km 86 km +73 km
26	KHYI LIC	HOWE TX BLH-970401KB	237 Class C3	10.5 kW	33-23-43 96-35-50	83 km 92 dg	92 km 86 km WITHIN
27	KKAJFM LIC	ARDMORE OK BLH-6267	239 Class C1	100.0 kW	34-05-56 97-10-54	80 km 21 dg	91 km 86 km WITHIN
28	KYXSFM LIC	MINERAL WELLS TX BLH-910517KD	240 Class C3	25.0 kW	32-48-42 98-06-11	89 km 220 dg	92 km 86 km WITHIN
29	KSCS LIC	FORT WORTH TX BLH-900518KD	242 Class C	99.0 kW	32-35-15 96-57-59	105 km 152 dg	93 km 88 km +75 km
30	KNKI LIC	SHERMAN TX BLH-840831CK	244 Class A	3.0 kW	33-42-10 96-34-05	91 km 70 dg	92 km 88 km WITHIN
31	KEGL LIC	FORT WORTH TX BLH-9999	246 Class C	97.0 kW	32-34-43 96-57-12	107 km 152 dg	93 km 85 km +70 km

JF&A
COMMUNICATIONS
CONSULTANTS

SERVICE TO PROPOSED AREAS

GTBC
GRAHAM, TX
EXHIBIT E

# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC 60 dBu	
32 KLAK LIC	DURANT OK BLH-980508KE	248 Class C2	27.0 kW	33-41-31 96-26-36	102 km 73 dg	92 km 50 km	+41 km
33 KBFB LIC	DALLAS TX BLH-910515KB	250 Class C	99.0 kW	32-35-15 96-57-59	105 km 152 dg	93 km 88 km	+75 km
34 KBOC LIC	BRIDGEPORT TX BMLH-971020KB	252 Class A	6.0 kW	33-13-28 97-47-51	36 km 231 dg	92 km 88 km	WITHIN
35 KFYZFM LIC	BONHAM TX BLH-960502KD	252 Class C3	25.0 kW	33-33-16 96-13-24	119 km 83 dg	92 km 31 km	+5 km
36 KACO LIC	ARDMORE OK BLH-971010KI	253 Class C3	14.0 kW	34-10-56 97-05-01	92 km 24 dg	91 km 37 km	+36 km
37 KLUVFM LIC	DALLAS TX BLH-990216KA	254 Class C	99.0 kW	32-35-19 96-58-05	105 km 152 dg	93 km 89 km	+76 km
38 KHCK LIC	DENTON TX BLH-880926KC	256 Class C	97.0 kW	33-23-22 97-33-53	8 km 237 dg	92 km 89 km	WITHIN
39 KPLX LIC	FORT WORTH TX BMLH-850211KR	258 Class C	100.0 kW	32-34-54 96-58-32	106 km 153 dg	93 km 99 km	+86 km
40 KLUR LIC	WICHITA FALLS TX BLH-6738	260 Class C1	100.0 kW	33-54-04 98-32-21	110 km 299 dg	91 km 69 km	+52 km
41 KRBV LIC	DALLAS TX BLH-970918KD	262 Class C	100.0 kW	32-35-05 96-57-46	106 km 152 dg	93 km 85 km	+71 km
42 KRJTFM LIC	BOWIE TX BLH-951122KC	264 Class C3	12.5 kW	33-38-43 97-49-08	39 km 308 dg	90 km 85 km	WITHIN
43 WRR LIC	DALLAS TX BLH-860130KF	266 Class C	98.0 kW	32-35-22 96-58-10	105 km 152 dg	93 km 86 km	+73 km
44 KZMPFM LIC	DENISON-SHERMAN TX BLH-921014KG	269 Class C3	17.5 kW	33-38-11 96-41-57	77 km 72 dg	92 km 86 km	WITHIN
45 KTXQ LIC	FORT WORTH-DALLAS TX BLH-910508KB	271 Class C	95.0 kW	32-34-54 96-58-32	106 km 153 dg	93 km 84 km	+71 km
46 KMADFM LIC	MADILL OK BLH-850523KA	272 Class A	3.0 kW	34-06-24 96-46-30	100 km 41 dg	92 km 18 km	+9 km
47 KQXC LIC	WICHITA FALLS TX BLH-940118KB	273 Class A	4.5 kW	33-56-30 98-34-07	115 km 300 dg	91 km 27 km	+5 km

# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC 60 dBu
48 KDMX LIC	DALLAS TX BLH-880718IG	275 Class C	99.0 kW	32-34-54 96-58-32	106 km 153 dg	93 km 83 km +69 km
49 KEMM LIC	COMMERCE TX BLH-980618KB	277 Class C2	50.0 kW	33-13-06 96-07-42	129 km 100 dg	92 km 50 km +13 km
50 KWFSFM LIC	WICHITA FALLS TX BLH-6181	277 Class C1	100.0 kW	33-53-47 98-32-33	110 km 298 dg	91 km 59 km +41 km
51 KVILFM LIC	HIGHLAND PARK-DALLAS TX BLH-990216KB	279 Class C	99.0 kW	32-35-19 96-58-05	105 km 152 dg	93 km 89 km +76 km
52 KXZN LIC	SANGER TX BLH-970310KA	281 Class C3	11.0 kW	33-25-29 97-16-11	21 km 91 dg	92 km 89 km WITHIN
53 KKDAFM LIC	DALLAS TX BLH-821029AL	283 Class C	98.0 kW	32-35-22 96-58-10	105 km 152 dg	93 km 87 km +74 km
54 KYII LIC	BURKBURNETT TX BLH-881118KA	284 Class C	100.0 kW	34-05-35 98-52-44	148 km 300 dg	91 km 74 km +18 km
55 KTCY LIC	PILOT POINT TX BLH-960923KE	285 Class C2	2.3 kW	33-33-36 96-57-35	52 km 73 dg	92 km 74 km WITHIN
56 KYNG LIC	DALLAS TX BLH-970909KG	287 Class C	100.0 kW	32-35-05 96-57-46	106 km 152 dg	93 km 86 km +73 km
57 KRNB LIC	DECATUR TX BLH-970722KC	289 Class C	100.0 kW	33-23-12 97-33-57	8 km 235 dg	92 km 86 km WITHIN
58 KHKS LIC	DENTON TX BLH-840523DM	291 Class C	100.0 kW	32-35-22 96-58-10	105 km 152 dg	93 km 87 km +74 km
59 KTLT LIC	WICHITA FALLS TX BLH-841126LE	292 Class A	2.4 kW	33-53-18 98-34-08	112 km 297 dg	91 km 26 km +7 km
60 KXGM LIC	MUENSTER TX BLH-911231KC	293 Class A	6.0 kW	33-38-34 97-19-15	29 km 34 dg	92 km 26 km WITHIN
61 KDXTFM LIC	GRANBURY TX BLH-900125KC	294 Class C	100.0 kW	32-15-07 98-02-48	140 km 202 dg	92 km 75 km +27 km
62 KYNZ LIC	LONE GROVE OK BLH-920611KB	294 Class A	5.5 kW	34-14-09 97-14-48	92 km 14 dg	91 km 28 km +27 km
63 KRVAFM LIC	MCKINNEY TX BLH-960724KC	295 Class A	3.9 kW	33-15-49 96-35-54	85 km 102 dg	92 km 28 km WITHIN

FCC Database Date: 9/11/1999

PAGE 5

# CALL STATUS	LOCATION STATE	CHANNEL POWER CLASS	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC 60 dBu
64 KWKQ LIC	GRAHAM TX BLH-981208KB	296 25.0 kW Class C3	33-07-37 98-35-35	108 km 252 dg	92 km 23 km +7 km
65 KOAI LIC	FORT WORTH TX BLH-970918KE	298 28.0 kW Class C1	32-35-05 96-57-46	106 km 152 dg	93 km 74 km +61 km
66 KDFT LIC	FERRIS TX BL-880505AD	540 1.0 kW Class D	32-30-53 96-34-46	133 km 140 dg	92 km 248 km +207 km
67 KLIF LIC	DALLAS TX -	570 5.0 kW Class B	32-56-40 96-59-25	71 km 139 dg	92 km 248 km WITHIN
68 KMKI LIC	PLANO TX BL-951017AD	620 5.0 kW Class B	33-14-34 96-32-29	91 km 103 dg	92 km 248 km WITHIN
69 KSKY LIC	BALCH SPRINGS TX BL-860721AM	660 10.0 kW Class B	32-45-02 96-41-41	106 km 135 dg	92 km 257 km +244 km
70 KKDA LIC	GRAND PRAIRIE TX BL-900511AE	730 0.5 kW Class B	32-45-51 96-59-26	87 km 147 dg	92 km 257 km WITHIN
71 KSEO LIC	DURANT OK BL-880823AA	750 0.3 kW Class D	34-00-07 96-25-19	118 km 57 dg	92 km 107 km +82 km
72 KPBC LIC	GARLAND TX BL-900718AD	770 10.0 kW Class B	33-01-58 96-34-31	96 km 117 dg	92 km 199 km +195 km
73 WBAP LIC	FORT WORTH TX BL-800125AB	820 50.0 kW Class A	32-36-38 97-10-00	96 km 161 dg	93 km 291 km +288 km
74 KFJZ LIC	FORT WORTH TX BL-870706AD	870 0.5 kW Class D	32-45-42 97-18-49	76 km 167 dg	93 km 291 km WITHIN
75 KXEB LIC	SHERMAN TX -	910 1.0 kW Class B	33-40-25 96-35-40	88 km 72 dg	92 km 291 km WITHIN
76 KKLF LIC	DENISON-SHERMAN TX -	950 0.5 kW Class B	33-41-08 96-32-28	93 km 72 dg	92 km 97 km +97 km
77 KHVN LIC	FORT WORTH TX -	970 1.0 kW Class B	32-47-56 97-17-43	72 km 165 dg	93 km 97 km WITHIN
78 KTUB LIC	WICHITA FALLS TX -	990 10.0 kW Class B	33-55-40 98-34-10	114 km 299 dg	91 km 200 km +177 km
79 KGGR LIC	DALLAS TX BL-171	1040 1.0 kW Class D	32-46-45 96-43-49	101 km 135 dg	92 km 112 km +103 km

FCC Database Date: 9/11/1999

PAGE 6

# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC .5 mV/m
80 KRLD LIC	DALLAS TX -	1080 Class A	50.0 kW ND	32-53-25 96-38-44	99 km 127 dg	91 km 225 km +218 km
81 KEOR LIC	ATOKA OK -	1110 Class D	5.0 kW DA	34-25-08 96-11-24	163 km 47 dg	92 km 192 km +121 km
82 KCLE LIC	CLEBURNE TX -	1120 Class D	0.3 kW ND	32-23-05 97-23-46	116 km 176 dg	93 km 73 km +49 km
83 KJSA LIC	MINERAL WELLS TX BL-860513AJ	1140 Class D	0.3 kW ND	32-47-12 98-05-53	91 km 219 dg	92 km 73 km WITHIN
84 KDMM LIC	HIGHLAND PARK TX BL-821209AF	1150 Class D	1.0 kW DA	32-53-36 96-55-33	80 km 138 dg	92 km 73 km WITHIN
85 KLUV LIC	DALLAS TX -	1190 Class B	50.0 kW DA	32-47-10 96-57-00	87 km 144 dg	92 km 73 km WITHIN
86 KZEE LIC	WEATHERFORD TX BL-961107AC	1220 Class D	0.5 kW ND	32-47-09 97-47-55	77 km 202 dg	92 km 73 km WITHIN
87 KVSO LIC	ARDMORE OK BL-831012AD	1240 Class C	1.0 kW ND	34-10-54 97-08-48	89 km 21 dg	91 km 73 km WITHIN
88 KESS LIC	FORT WORTH TX BL-384	1270 Class B	5.0 kW DA	32-43-36 97-11-30	83 km 160 dg	93 km 73 km WITHIN
89 KWFS LIC	WICHITA FALLS TX -	1290 Class D	5.0 kW ND	33-57-38 98-33-42	115 km 301 dg	91 km 112 km +89 km
90 KTCK LIC	DALLAS TX BL-810812AD	1310 Class B	5.0 kW DA	32-56-41 96-56-25	74 km 136 dg	92 km 112 km WITHIN
91 KSWA LIC	GRAHAM TX -	1330 Class D	0.5 kW ND	33-07-37 98-35-35	108 km 252 dg	92 km 71 km +56 km
92 KKEN LIC	DUNCAN OK BL-890417AK	1350 Class D	0.2 kW ND	34-30-43 97-58-05	128 km 340 dg	90 km 83 km +47 km
93 KAHZ LIC	FORT WORTH TX -	1360 Class B	5.0 kW ND	32-46-21 97-24-48	73 km 174 dg	93 km 83 km WITHIN
94 KXCA LIC	LAWTON OK -	1380 Class B	1.0 kW DA	34-35-24 98-21-44	152 km 328 dg	89 km 128 km +68 km
95 KBEC LIC	WAXAHACHIE TX BL-930115AC	1390 Class B	0.5 kW DA	32-26-45 96-48-15	127 km 149 dg	93 km 61 km +26 km

JF&A
COMMUNICATIONS
CONSULTANTS

SERVICE TO PROPOSED AREAS

GTBC
GRAHAM, TX
EXHIBIT E

		FCC Database Date: 9/1999				PAGE 7		
# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KBOC .5 mV/m		
96 KGV LIC	GREENVILLE TX -	1400 Class C	1.0 kW ND	33-10-02 96-05-55	133 km 102 dg	92 km 76 km	+35 km	
97 KRJT LIC	BOWIE TX -	1410 Class D	0.5 kW DA	33-35-10 97-48-23	34 km 301 dg	91 km 76 km	WITHIN	
98 KFYN LIC	BONHAM TX -	1420 Class D	0.3 kW ND	33-34-40 96-09-55	124 km 82 dg	92 km 82 km	+50 km	
99 KPAR LIC	GRANBURY TX BL-800227AB	1420 Class B	0.5 kW DA	32-27-43 97-47-19	111 km 195 dg	92 km 46 km	+27 km	
100 KROO LIC	BRECKENRIDGE TX BL-961127AH	1430 Class D	1.0 kW ND	32-45-11 98-55-57	154 km 241 dg	92 km 71 km	+9 km	
101 KTNO LIC	DENTON TX -	1440 Class B	5.0 kW ND	33-09-45 97-06-18	47 km 129 dg	91 km 71 km	WITHIN	
102 KVLH LIC	PAULS VALLEY OK BL-840626AB	1470 Class D	1.0 kW DA	34-42-15 97-15-19	143 km 9 dg	92 km 103 km	+52 km	
103 KDXX LIC	DALLAS TX BL-900607AC	1480 Class B	5.0 kW DA	32-39-42 96-39-20	116 km 137 dg	92 km 105 km	+82 km	
104 KJIM LIC	SHERMAN TX -	1500 Class D	1.0 kW DA	33-41-30 96-33-29	92 km 71 dg	92 km 105 km	WITHIN	
105 KOMA LIC	OKLAHOMA CITY OK -	1520 Class A	50.0 kW ND	35-20-00 97-30-16	211 km 360 dg	91 km 212 km	+93 km	
106 KZMP LIC	FORT WORTH TX BL-811030AI	1540 Class B	50.0 kW DA	32-39-05 97-11-38	91 km 162 dg	93 km 212 km	WITHIN	
107 KMAD LIC	MADILL OK -	1550 Class D	0.3 kW ND	34-06-24 96-46-30	100 km 41 dg	92 km 72 km	+63 km	
108 KPYK LIC	TERRELL TX BL-880802AC	1570 Class D	0.3 kW ND	32-44-35 96-18-18	134 km 124 dg	91 km 74 km	+31 km	
109 KGAF LIC	GAINESVILLE TX BL-850812AD	1580 Class B	0.3 kW ND	33-37-42 97-06-25	42 km 58 dg	92 km 74 km	WITHIN	
110 KRVA LIC	COCKRELL HILL TX BL-900131AJ	1600 Class B	5.0 kW DA	32-44-25 96-42-38	106 km 136 dg	92 km 92 km	+79 km	
111 KR2XVA LIC	FORT WORTH TXBLEX-930514AA	1600 Class D	0.2 kW ND	32-47-16 97-19-16	73 km 167 dg	93 km 92 km	WITHIN	

08-30-1999

John Furr & Associates Inc.

PAGE 1

FM Study for: KBOC-C2
 Location: BRIDGEPORT, TX
 Call City, State
 Status Proponent

FCC Database Date: 9/1999 33-22-53
 Channel Class: C2 97-35-11
 Chan Class Freq kW Latitude Dist. Required
 File Number HAAT Longitude Azm. Clear (km)

>>>>>> Study For Channel 252 98.3 MHz <<<<<<<

KBOC BRIDGEPORT, TX 252 A 98.3 6.0 33-13-28 26.3 166
 LIC Community Broadcast N BMLH-971020KB 69 97-47-51 228.5 -139.7 SHORT
 Use of 73.215 for short spacing requires: 143 -116.7 SHORT
 From Channel 244A per D96-10

KFYZFM BONHAM, TX 252 C3 98.3 5.5 33-37-30 119.5 177 73.215
 CP Bonham Broadcasting C BPH-971002IC 209 96-20-03 76.6 -57.5 SHORT
 Use of 73.215 for short spacing requires: 166 -46.5 SHORT
 From channel 252A Per D89-209

KFYZFM BONHAM, TX 252 C3 98.3 25. 33-33-16 128.2 177
 LIC Bonham Broadcasting C BLH-960502KD 83 96-13-24 81.0 -48.8 SHORT
 Use of 73.215 for short spacing requires: 166 -37.8 SHORT
 From channel 252A Per D89-209

KCUBFM STEPHENVILLE, TX 252 A 98.3 3.0 32-17-07 131.2 166
 APP M & M Broadcasters, L BPH-990208IA 100 98-06-53 202.3 -34.8 SHORT
 Use of 73.215 for short spacing requires: 143 -11.8 SHORT

KCUBFM STEPHENVILLE, TX 252 A 98.3 3.0 32-12-18 144.8 166
 LIC M & M Broadcasters, L BLH-900706KC 100 98-15-23 205.9 -21.2 SHORT
 Use of 73.215 for short spacing requires: 143 +1.8 CLOSE

KACO ARDMORE, OK 253 C3 98.5 14.0 34-10-56 100.3 117 73.215
 LIC KRIG, Inc. BLH-971010KI 104 97-05-01 27.5 -16.7 SHORT
 Use of 73.215 for short spacing requires: 106 -5.7 SHORT
 From Channel 243A per D96-10; from Channel 253A per one-step application.
 Petition for Recon D96-10 filed 2-18-97-Dismissed MO&O D96-10, 970815

KJMZ LAWTON, OK 251 C1 98.1 100. 34-35-27 151.7 158
 LIC Sovereign Broadcastin BLH-4928 61 98-21-10 332.4 -6.3 SHORT
 Use of 73.215 for short spacing requires: 144 +7.7 CLOSE
 Horizontally polarized only

FR ADD GRAHAM, TX 253 A 98.5 33-02-30 106.08 106
 ADD Graham Tollway Broadc Docket-99-233 0 98-39-00 249.5 +0.08 CLOSE
 Drop-in; 9.2 km SW of Granham

KLUVFM DALLAS, TX 254 C 98.7 99. 32-35-19 105.22 105
 LIC Infinity Broadcasting BLH-990216KA 507 96-58-05 146.5 +0.22 CLOSE

KBFB DALLAS, TX 250 C 97.9 99. 32-35-15 105.40 105
 LIC WHFS, Inc. BLH-910515KB 491 96-57-59 146.5 +0.40 CLOSE

JF&A
 COMMUNICATIONS
 CONSULTANTS

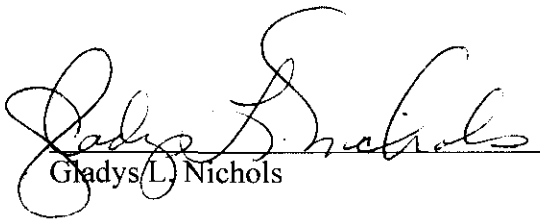
ALTERNATIVE ALLOCATION

GTBC
 GRAHAM, TX
 EXHIBIT F

CERTIFICATE OF SERVICE

I, Gladys L. Nichols, certify that I served this date a copy of the foregoing
REPLY TO COUNTERPROPOSAL on counsel for North Texas Radio Group, L.P. by
first class mail at the address below:

Robert Lewis Thompson
Taylor Thiemann & Aitken, L.C.
908 King Street
Suite 300
Alexandria, Virginia 22314


Gladys L. Nichols

Executed on August 31, 1999.